

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

AIM LEASING COMPANY, et al.,)	CASE NO. 4:14-cv-02161-BYP
)	
<i>Plaintiffs,</i>)	JUDGE BENITA Y. PEARSON
)	
v.)	
)	
SAFE FLEET INSURANCE SERVICES,)	
INC., et al.,)	
)	
<i>Defendants.</i>)	

**MOTION OF DEFENDANTS SAFE FLEET INSURANCE SERVICES, INC. AND
DAVID WILLIAMS TO FILE PROPOSED STIPULATIONS IN SUPPORT OF THEIR
MOTION FOR SUMMARY JUDGMENT AS TO PLAINTIFFS' FIRST AMENDED
COMPLAINT, *INSTANTER***

Defendants Safe Fleet Insurance Services, Inc. (“Safe Fleet”) and David Williams (“Williams”) move this Court to grant leave to file *instanter* certain stipulations of undisputed facts relative to their dispositive motion filed in this matter that addresses all of the claims set forth in the Amended Complaint of Plaintiffs Aim Leasing Company d/b/a Aim NationalLease, Aim Leasing Drivers Company d/b/a Aim Dedicated Logistics and Aim Integrated Logistics, Inc. (collectively, “AIM”).

Counsel for Safe Fleet and Williams acknowledge that the Case Management Plan provided that proposed stipulations shall be filed with the Court on or before May 9, 2016 (Doc. No. 50, PageId # 264), but assert that confusion regarding the intention of the Case Management Plan caused them to not file stipulations by that deadline. Other defendants separately have filed stipulations relating to their own dispositive motions addressing the Cross-Claims maintained by Safe Fleet and Williams in this action. (Doc. Nos. 137, 139.) Because those stipulations do not

encompass all of the stipulations of undisputed facts that are agreed to by both Safe Fleet and Williams and AIM as to the claims asserted in the Amended Complaint, Safe Fleet and Williams now seek leave of this Court to provide those additional stipulations, *instantly*.

The requested leave is not sought for purposes of delay, but to assist the Court.

Respectfully submitted,

/s/ Adam J. Russ

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on May 17, 2016. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Adam J. Russ

*One of the Attorneys for Defendants and Third-
Party Plaintiffs Safe Fleet Insurance Services, Inc.,
and David Williams*